

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
"BOB" MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S), JANE DOE(S),
DELAWARE and OTHER LAW FIRMS
representing and acting in concert with John
Doe(s) and/or Jane Doe(s), INVESTMENT
BANKS employed by John Doe(s) and/or Jane
Doe(s), PATRIC THEUNE, and SEECUBIC
B.V.,

Defendants.

Adv. No. 23-00057

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**REVISED WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS' MOTION
FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND
PERMANENT INJUNCTION**

The above captioned Debtors, Debtors in Possession, and Plaintiffs, (“Debtors”) submit this revised witness and exhibit list for the hearing scheduled for **October 16, 2023, at 10:30am (ET)** (“Hearing”) before the Honorable Magdeline D. Coleman, in the United States Bankruptcy Court for the Eastern District of Pennsylvania, located at 900 Market Street, Suite 203, Philadelphia, Pennsylvania, 19807.

WITNESSES

The Debtors designate the following persons as witnesses who may be called at the Hearing:

1. Mathu Rajan, Founder and CEO of StreamTv
2. Shadron Stastney, Executive Chairman of SeeCubic, Inc.
3. Charles Robertson, former officer of StreamTv
4. Chris Michaels, President and CEO of Brown & Michaels, PC

The Debtors also cross-designate all witnesses designated by any other party in connection with the Hearing, and reserve the right to call any necessary rebuttal or impeachment witnesses.

EXHIBITS

The Debtors designate the following exhibits that may be used at the Hearing:

| Exhibit No. | Description |
|--------------------|---------------------------------|
| 1 | Philips License |
| 2 | Rembrandt License |
| 3 | License Covenant |
| 4 | SeeCubic Subscription Agreement |

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| 5 | SeeCubic 2022 Private Placement Memorandum |
| 6 | SeeCubic 2020 Private Placement Memorandum |
| 7 | Stastney Deposition Transcript |
| 8 | Declaration of Mathu Rajan |
| 9 | Declaration of Charles Robertson |
| 10 | <i>SI Handling Sys. v. Heisley</i> , 753 F.2d 1244, 1264 (3d Cir. 1985) |
| 11 | <i>Par Pharm., Inc. v. Quva Pharma, Inc.</i> , 764 F. App'x 273, 279-80 (3d Cir. 2019) |
| 12 | <i>BP Chems. Ltd. v. Formosa Chem. & Fibre Corp.</i> , 229 F.3d 254, 263 (3d Cir. 2000) |
| 13 | <i>Ilapak, Inc. v. Young</i> , 2020 U.S. Dist. LEXIS 94550, at *15-17 (E.D. Pa. May 29, 2020) |
| 14 | <i>Middle E. Forum v. Reynolds-Barbounis</i> , 2021 U.S. Dist. LEXIS 4350, at *17 (E.D. Pa. Jan. 8, 2021) |
| 15 | <i>Razor Tech., LLC v. Hendrickson</i> , 2018 U.S. Dist. LEXIS 74918, at *29 (E.D. Pa. May 3, 2018) |
| 16 | <i>N. Am. Dental Mgmt., LLC v. Phillips</i> , 2023 U.S. Dist. LEXIS 122070 (W.D. Pa. July 14, 2023) |
| 17 | <i>Cont'l Grp., Inc. v. Amoco Chems. Corp.</i> , 614 F.2d 351 (3d Cir. 1980) |
| 18 | <i>Ritescreen Co., LLC v. White</i> , 2023 U.S. Dist. LEXIS 140983 (M.D. Pa. Aug. 11, 2023) |
| 19 | <i>Advanced Fluid Sys. v. Huber</i> , 958 F.3d 168 (3d Cir. 2020) |
| 20 | <i>In re StreamTv</i> June 27, 2023 Hearing Transcript |
| 21 | StreamTv TRO Power Point |
| 22 | <i>In re StreamTv</i> April 14, 2023 Hearing Transcript |
| 23 | <i>In re StreamTv</i> June 29, 2023 Hearing Transcript |
| 24 | SeeCubic et al September 12, 2023 Dutch Claim Amendment |
| 25 | Stastney SEC Violation Order |
| 26 | Morton Cold Shoulder |
| 27 | Stastney Employment Agreement |

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| 28 | Google Purchase Order |
| 29 | Roughly Email |
| 30 | Banerjee Email |
| 31 | Google Inbound Services Agreement |
| 32 | Delaware Supreme Court En Banc Opinion |
| 33 | Delaware Supreme Court Mandate |
| 34 | Chancery Court TRO Granted to Stream |
| 35 | Chancery Court Partial Final Judgment per Rule 54(b) |
| 36 | Chancery Court Order Regarding Motion for Mandatory Injunction Final |
| 37 | Chancery Court Opinion on Emergency Motion to Enforce |
| 38 | SCI Email to Shareholders re CES |
| 39 | Hearing Transcript-Highlighted |
| 40 | Damvelt Email 1 |
| 41 | Damvelt Email 2 |
| 42 | SCI Website |
| 43 | Stream Website |
| 44 | Hawk Proof of Claim |
| 45 | SLS Proof of Claim |
| 46 | SeeCubic Inc Proof of Claim |
| 47 | Stastney Resolution (Release) |
| 48 | BOE Cooperation Agreement |
| 49 | Padillia Ruling |
| 50 | VSI Purchase Order 1 March 20, 2023 |

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| 51 | VSI Purchase Order 2 April 11, 2023 |
| 52 | Cystar Purchase Order |
| 53 | Southern Telecom Purchase Order |
| 54 | SeeCubic BV-Stream Note |
| 55 | Ultra D-Stream Note 1 December 2012 |
| 56 | Ultra D-Stream Note 2 December 2016 |

The Debtors also cross designate all exhibits designated by any other party in connection with the Hearing and reserve the right to use additional exhibits for rebuttal or impeachment purposes.

The Debtors reserve the right to amend or supplement this witness and exhibit list prior to the Hearing.

Dated: October 14, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)

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(*pro hac to be filed*)

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